



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

**COPY**

*Tuchman Cleaners*  
Site # *1991 02 503*  
General Correspondence

www.in.gov/idem

June 18, 2002

**VIA CERTIFIED MAIL:** 7000 0600 0026 4647 9151

Mr. Randy Jackson  
National Dry Cleaners, Inc.  
4510 W. 63<sup>rd</sup> Terrace  
Prairie Village, KS 66208

Dear Mr. Jackson:

Re: Investigation Work Plan  
Tuchman Cleaners  
4401 N. Keystone Ave.  
Indianapolis, Marion County  
IDEM Incident #1991-02-503

The Indiana Department of Environmental Management (IDEM) has reviewed the documents *Investigative Work Plan (IWP)* and *Response to IDEM Comment Letter (12/11/01)*, dated March 4, 2002, prepared by URS Corporation (URS). The following comments must be addressed before the work plan can be approved:

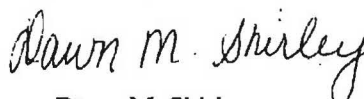
- 1) The proposed locations of the monitoring wells and soil borings are appropriate. However, a minimum of one additional monitoring well is necessary directly down-gradient from the recovery well RW-1 to evaluate the efficiency of the recovery system. As an alternative, proposed monitoring wells MW-14 and MW-14I could be relocated slightly northwest of their current position in order to be directly down-gradient of RW-1.
- 2) To prevent cross-contamination between aquifers at various depths, monitoring wells that are screened in the intermediate and deep aquifers must be double-cased above the screened interval in the aquifer of interest.
- 3) An off-site investigation work plan must be developed and approved by IDEM prior to the development of an on-site remedial work plan. A remedial system can not be developed until the full extent of contamination is known. The results of the on-site investigation may be used to provide a foundation for the development of the off-site investigation work plan. An off-site investigation work plan must be submitted to IDEM within 30 calendar days following receipt of the on-site investigation report.
- 4) Quarterly groundwater sampling is required for this facility. This has been stated numerous times in letters from IDEM to DCI Management (July 12, 2001 and December 11, 2001). This same statement was reiterated a number of times during the meeting between DCI Management, URS, and IDEM on January 17, 2002.

As discussed in a telephone conversation on April 22, 2002 with URS, quarterly groundwater sampling may commence with field investigation activities scheduled for June 2002. However, quarterly groundwater sample results must be submitted to IDEM no later than July 31, 2002. Additional quarterly sampling results will be due on October 31, January 31, April 30, and July 31 of each year.

- 5) Risk Integrated System of Closure (RISC) default residential and industrial closure levels are referenced in Table Six of the IWP. The use of RISC is not appropriate on a site where free product is present. Free product **must** be mitigated before IDEM will consider the usage of a RISC, non-default approach. This site is not eligible for industrial closure (default or non-default approach) due to the proximity of the Fall Creek Well Field.
- 6) The IWP must also address the potential for subsurface vapor intrusion of volatile organic compounds (VOCs) into indoor air at the Tuchman facility. However, to facilitate timely implementation of the IWP, a work plan to address potential vapor intrusion may be submitted to IDEM in a separate addendum.
- 7) Following IDEM receipt, review, and final approval of the revised IWP, a revised field schedule (Table 5 of the IWP) must be submitted to IDEM.

Please address these comments within 15 calendar days after receipt of this letter. If you have any questions, or if I can be of additional assistance, please contact me at (317) 234-0434.

Sincerely,



Dawn M. Shirley  
State Cleanup Section  
Office of Land Quality

DMS:tr

cc: Public file  
Ms. Meredith Gramelspacher, IDEM OLC  
Mr. Mike Holman, Marion County Health Department  
Mr. Dennis Connair and Mr. William Eckhoff, URS, via facsimile, (513) 651-3452

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1. Article Addressed to:

66-30  
Mr. Randy Jackson  
National Dry Cleaners, Inc.  
4510 W. 63<sup>rd</sup> Terrace  
Prairie Village, KS 66208

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